

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
Atlanta Division

NORMA VOGEL, by Next Friend,)	
KAREN J. ISBELL, natural daughter)	
and under Power of Attorney,)	
)	
Plaintiff,)	CIVIL ACTION
vs.)	
)	FILE NO. 1:18-CV-03472-MHC
SOUTHWEST AIRLINES CO.; and)	
PROSPECT AIRPORT SERVICES,)	
)	
Defendants.)	

**JOINT MOTION TO EXTEND STAY OF DEADLINES AND THE
DEADLINE TO COMPLETE MEDIATION**

COME NOW plaintiff Norma Vogel, by Next Friend, Karen J. Isbell, natural daughter and under Power of Attorney, and defendants Southwest Airlines Co. and Prospect Airport Services, parties in the above-styled civil action, and move this Court for an Order Extending the Deadline to Complete Mediation by 120 days to terminate on Tuesday July 28, 2020. In support of this motion, the parties show this Court the following:

1. On April 16, 2019, this Court entered an Order amending the August 22, 2018, Scheduling Order. (See Document No. 15 and 40).
2. On August 8, 2019, this Court entered an Order further amending the Scheduling Order. (See Document No. 49).

3. On November 15, 2019, this court stayed this case and all of the associated deadlines for 135 days so that the parties could mediate the case by March 30, 2020.

4. The parties agreed to mediate, and were scheduled to hold a mediation on March 26, 2020 in Kansas City, Missouri. (See attached Letter to Confirm Mediation).

5. The attorneys for Plaintiff and Defendant Southwest Airlines Co. are located in Atlanta, Georgia. Counsel for Defendant Prospect Airport Services is located in Chattanooga, Tennessee. Representatives of all defendants and an insurer are located in Texas. Given Norma Vogel's medical condition, counsel for the parties determined that it would be best to travel to Kansas City, Missouri for the mediation so that Ms. Vogel would not have to travel.

6. Due to the recent impact of the COVID-19 virus, including the State of Emergencies issued in Missouri and Georgia, the travel restrictions suggested by the Center for Disease Control, and applicable mandatory company-wide travel restrictions, the parties are no longer able to attend the previously scheduled mediation. The parties have agreed to reschedule the mediation once we have certainty regarding travel restrictions and social distancing recommendations. The parties are also exploring the possibility of a mediation by video-conference.

7. The parties request a further stay of all deadlines through July 28, 2020. The parties will submit a proposed amended scheduling order by July 28, 2020, if

the case is not resolved at mediation. Once the parties have completed mediation, the parties will promptly advise this Court of the outcome.

8. The request is made not for the purpose of delay. Instead, the parties wish for the opportunity to try and resolve this matter before spending additional time and resources.

WHEREFORE, the parties pray that this motion be granted and that the deadline to complete mediation be extended by 120 days through and including July 28, 2020.

Respectfully Submitted,

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This is to certify that the foregoing pleading was prepared using Times New Roman 14 point font in accordance with Local Rule 5.1(C).

By: /s/Nicole Wolfe Stout
Nicole Wolfe Stout

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing JOINT MOTION TO EXTEND THE STAY OF DEADLINES AND DEADLINE TO COMPLETE MEDIATION, by electronic filing and service upon:

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This 24th day of March, 2020.

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